

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Criminal Action No. 09-CR-29
(Hon. Gary L. Sharpe)

v.

JOSEPH L. BRUNO,

Defendant.

**Government's Application to Seal Submissions A and B Submitted
For the Court's Ex Parte, In Camera Review**

Pursuant to Local R. 13.1, the Government hereby moves for sealing of Submissions A and B and any attachments thereto, which are being submitted for the Court's ex parte, in camera review. In support of this Application, as set forth in greater detail in the Government's Memorandum in Support of this Application and Its Motion for In Camera Review, a Determination that Material Submitted for In Camera Review Need Not Be Disclosed to the Defense, and Related Relief, the Government states that sealing is appropriate at this time to maintain the confidentiality of the information contained in Submissions A and B, which the Government believes need not be disclosed to the defense pursuant to the Jencks Act, 18 U.S.C. § 3500, Fed. R. Crim. P. 16, Brady v. Maryland, 373 U.S. 83 (1963), or Giglio v. United States, 405 U.S. 150 (1972). Sealing is also appropriate to protect other interests including the law enforcement privilege and the privacy interests of third parties.

The Government does not apply for sealing of this Application
or for sealing of the accompanying order.

Respectfully submitted,

ANDREW T. BAXTER
United States Attorney

By: /s/ Elizabeth C. Coombe
Elizabeth C. Coombe
William C. Pericak
Assistant U.S. Attorneys

Dated: October 5, 2009

